AWS Efficiency Issues
(3-10-10 update)

February 23, 2010 meeting:
Listed below are items the Work-Group identified during the February 23, 2010 meeting. Excluded from the list are items that were of a policy or statutory nature and thus beyond the purview of this Work-Group. Those items will be addressed in a separate public process. The Department categorized each issue in the following areas:

A. Review/Process issues (8 issues)
B. Uncertainty (9 issues)
C. Technology/Technical issues (6 issues)
D. Meetings/Communications (5 issues)

Category	Issues
A	DWR is too restrictive on the use of existing models
A	DWR should rely on judgment of registered professionals; current level of review is too detailed
A	Too many second reviews and hand-offs
A	Should have one person designated as the DWR champion for each application
A	Reviews (legal, hydrological) should be parallel and not sequential
A	Multiple reviews. It is not a linear process and this causes redundancy. All comments and reviews should be done concurrently.
A	DWR should get one bite at the apple
A	Incomplete INI letters
B	Inability of applicants to predict what will be needed for hydrology
B	Uncertainty regarding new rules for Santa Cruz AMA
B	Review process is not transparent; the applicant is not knowledgeable about what is needed
B	Process does not follow the 2006 rules all the time
B	There are no criteria for when which hydrologic model might be used
B	Modeling – there is no standard for data entry.
B	Uncertainty and lack of consistency in hydrologic analysis
B	Applications in limbo – no reason(s) stated
B	Appearance of bias towards/against applicants
C	Need more standardization
C	Need a checklist that is publicly available online, showing project time stamps and tracking
C	Need an electronic database that could be filled out and submitted online
C	Database should be updated, especially for Wells 55, AWS, etc.

	Expedite this.
C	Provide more info on the Web
C	Need tracking info
D	Decision makers not at meetings
D	Too many DWR employees at meetings
D	INI letters are too long and ask for repetitive info already available to DWR
D	Pre-application required info is not clear; there are no clear guidelines. Feedback from pre-application is not useful; applications are inconsistent.
D	Don't ask more than once for additional info
on-going	DWR should be asked to conduct its own analysis and identify bottlenecks.

March 9, 2010

During the March 9, 2010 meeting the Department presented issues identified during its internal review process. The review was headed by Ty Howard, Assistant Director Information Technology Division, in order to bring a neutral perspective to the review which included all individuals from the Legal, Hydrology and Water Management Divisions involved with reviews of assured and adequate water supply applications. The Department also compared its process with similar permitting programs from other agencies in Arizona, California, New Mexico, and Texas. Several identical and similar issues were identified by staff and the Workgroup. Issues identified by staff are categorized and summarized below:

(The same categories were used.)

A. Review/Process issues (5 issues)
B. Uncertainty (1 issue)
C. Technology/Technical issues (2 issues)
D. Meetings/Communications (5 issues)

Category	**Issues**
A	Unclear guidelines result in incomplete & incorrect applications initially, crating the need for incomplete letters.
A	Full use of LTF clock causes unnecessary delay regardless of permit types; no internal timeframes
A	"Non-standard" permit applications clog the system and slow review of "standard" applications
A	Processing multiple applications with varying levels of complexity simultaneously (multi-tasking) slows progress for all
A	Internal communication and file management not standardized
B	Lack of clear guidance on ensuring an audit of applications for consistency and standard review process
C	Incomplete & inconsistent information available to applicants on required demand information prior to initiating application

	process
C	Lack of communication as to current status of application (which review phase has been completed)
D	Current pre-application meeting structure insufficient so incomplete applications are submitted, expectations are not clearly defined, applicants are not properly educated, and appropriate decision makers are not always available
D	Meeting minutes and summaries are not always clear enough so all parties know what is expected
D	Applicants are not clear on steps or phases of review process
D	Too many repeated requests on multiple errors within same application
D	Lack of clear sign-off's that the application has passed specific review stages

The Department presented a work-flow summary that included a completion checklist contained in the AWS database known as the "dashboard". This dashboard is used by file managers and supervisors to track the progress of files undergoing the review process. The dashboard was presented as a possible link via the web as a progress/tracking tool for applicants.

Also discussed by the Workgroup were several organizational and work-flow issues within the Department:

- Applications are currently peer reviewed by staff as a final QA/QC review to ensure the file is complete before issuance. It was revealed that the OAWS manager also conducts a final review of all applications. Although the peer review usually takes only 5 minutes to at most an hour, the question was raised, do we need both?

- Also raised was the question does OAWS wait on their reviews before completed by other divisions? In most cases the various reviews occur concurrently, however certain questions must be answered before all reviews can be completed due to different requirements (surface water vs. groundwater for example – one is a renewable supply thus consistent with the goal, and both have differing physical availability tests for example).

- What is the QA/QC & work assignment process in hydrology?

- Work task assignments in hydrology should be geographically based to allow staff to develop expertise in the hydrologic conditions of the area; may eliminate two different reviewers requiring different model & data requirements under essentially the same conditions.

- It was suggested that removing division separations would help eliminate time lost in handing-off applications between divisions, and provide for accountability for delays and repeated data requests. Two models were proposed. The first was to house the entire program within hydrology and have hydrologists handle the entire file review process. Great concern was expressed by many members that this would not result in time savings and actually would result in greater delays since currently the hydrology staff only review the hydrologic reports of the applications that require physical availability proof; the majority of applications (60 – 70%) do not require such reviews. A cost factor was also raised since hydrology staff usually have higher compensation rates than other OAWS staff; this model would not result in either cost or time savings. A hybrid model was also proposed where non-hydrology staff and hydrology staff are housed within the same section where non-technical staff review non-technical applications and hydrologic staff concentrate reviews of technical hydrologic questions. Several Workgroup members saw the separation of the divisions as removing the accountability for delays and repeated data requests; combining under one section could restore this accountability. Some logistical and QA/QC concerns were also raised with either of these approaches.

- It was also suggested that ADWR research the entire state and determine hydrologic conditions and where possible total supply available to allocate without putting that burden on applicants, and eliminating the piece-meal approach and conflicting model issues now facing applicants. Although it was agreed in a perfect world this was laudable; current projected resource shortages makes this impracticable.